

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

(1) GREAT LAKES INSURANCE SE,)
)
Plaintiff,)
)
v.) Case No. CIV-22-702-JD
)
(2) FREDY VALLE d/b/a BALLE)
TRUCKING;)
(3) SILVER STAR CONSTRUCTION)
COMPANY, INC.;)
(4) TYLON MACKEY;)
(5) ISRAEL JUAREZ;)
(6) ORD TRUCKING, INC;)
(7) ZURICH AMERICAN INS. CO.,)
)
Defendants.)
)

**PLAINTIFF/COUNTER-DEFENDANT GREAT LAKES
INS. CO.'S MOTION FOR TWO-WEEK EXTENSION
OF TIME TO FILE JOINT STATUS REPORT**

1. Great Lakes Insurance brought this declaratory judgment action to determine if it owes any insurance coverage for the tort liability claims made in a state-court lawsuit. Doc. 1. Defendant Zurich American Insurance Company has filed a counterclaim seeking declaratory judgment. Doc. 27.

2. The Court recently lifted the stay on this lawsuit and directed counsel to file a Joint Status Report proposing the remaining deadlines in this action on or before August 30, 2024. Doc. 114.

3. Great Lakes Insurance very recently retained the undersigned counsel to continue the prosecution of this lawsuit. *See* Doc. 115. The undersigned counsel

anticipates that the prior counsel will seek to withdraw from representing Great Lakes Insurance in this lawsuit.

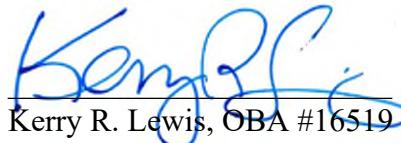
4. Great Lakes Insurance, through its undersigned counsel, seeks to extend the deadline by which the Joint Status Report must be filed from August 30, 2024, to September 13, 2024, in order to properly review this case to present appropriate proposed dates in the Joint Status Report.

5. Counsel for the parties do not object to this Motion or the relief sought by Great Lakes Insurance except that the undersigned has not heard back from counsel for Tyler Mackey about whether or not it objects to this Motion.

WHEREFORE Great Lakes Insurance Company asks this Court for a two-week extension, or until September 13, 2024, to submit the Joint Status Report.

Dated this 27th Day of August 2024.

Respectfully submitted:



Kerry R. Lewis, OBA #16519
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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2024, a true and correct copy of the above and foregoing was filed electronically in the Court's ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's ECF system.

/s/ Kerry R. Lewis
Kerry R. Lewis